

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,

Plaintiff,

vs.

MATSON NAVIGATION COMPANY,
INC.; and PACIFIC LIVESTOCK,
INC.,

Defendants.

CIVIL NO. 1:04cv-00049 JMS-BMK
(In Admiralty)

DECLARATION OF RANDOLF
L.M. BALDEMOR and EXHIBITS
“A”-“C”

DECLARATION OF RANDOLF L.M. BALDEMOR

I, RANDOLF L.M. BALDEMOR, declare:

1. I am one of the attorneys representing Defendant Matson Navigation Company, Inc. (“Defendant Matson”), and have personal knowledge of the information contained herein.
2. I am an attorney with the law firm of Goodsill Anderson Quinn & Stifel, LLP, and am licensed to practice law before the courts of the State of Hawaii.
3. Attached hereto as Exhibit “A” is a true and correct copy of Plaintiff’s Response to Defendant Matson Navigation Company, Inc.’s Request for Admission dated March 20, 2006.
4. Attached hereto as Exhibit “B” is a true and correct copy of the pertinent pages of the Deposition of Robert Riley, taken on August 25, 2005.

5. Attached hereto as Exhibit "C" is a true and correct copy of the pertinent pages of the Deposition of Paul A. Londynsky, taken on May 12, 2005.

I declare the foregoing under penalty of perjury under the laws of the United States.

DATED: Honolulu, Hawaii, April 6, 2006.

/s/ Randolph L.M. Baldemor

RANDOLF L. M. BALDEMOR